

LAW OFFICE OF  
GARO B. GHAZARIAN  
State Bar No. 152790  
15915 Ventura Blvd., Suite 203  
Encino, California 91436  
Tel: (818)905-6484  
Fax: (818)905-6481

Attorney for Defendant  
ARA E. AVETYANTS

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE ROGER T. BENITEZ)

UNITED STATES OF AMERICA,	)	No. CR 08-1455 BEN
Plaintiff,	)	
v.	)	<b>REQUEST FOR ORDER SHORTENING</b>
	)	<b>TIME; DECLARATION OF COUNSEL</b>
ARA E. AVETYANTS, et al.	)	<b>IN SUPPORT THEREOF; AND</b>
Defendants.	)	<b>[PROPOSED] ORDER</b>

Defendant ARA E. AVETYANTS, through counsel of record,  
GARO B. GHAZARIAN, hereby respectfully requests that this Court  
issue an order shortening time for the filing of defendant's  
joinder in the motions previously filed on behalf of co-  
defendants; and for the filing of defendant's motion to  
suppress evidence. This, so that the motions can be heard on  
the currently scheduled date, on August 11, 2008 at 2:00 P.M.

Date: August 5, 2008

Respectfully submitted,

/s/ Garo Ghazarian  
Garo B. Ghazarian  
Attorney for Defendant  
ARA E. AVETYANTS

**DECLARATION OF COUNSEL GARO B. GHAZARIAN**

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3 1. I am the attorney of record for defendant ARA E.  
4 AVETYANTS.

5 2. The above-entitled matter is currently scheduled for  
6 motion hearing date on August 11, 2008 at 2:00 p.m.

7 3. The research and investigation related to counsel's  
8 representation of the defendant in this matter took longer than  
9 it was anticipated, partially due to the fact that the case  
10 involves somewhat of a novel issue.

11 4. Counsel was also engaged in a felony jury trial, in  
12 the matter of People v. Arman Isayan, Case No. LA054082, in Los  
13 Angeles Superior Court.

14 5. In addition, counsel encountered a somewhat unusually  
15 heavy court calendar, which further contributed to the delay in  
16 the completion of research in this matter.

17 6. Counsel attempted to contact Assistant U.S. Attorney  
18 Rebecca Kanter on this date to obtain the Government's position  
19 with respect to the request for an order shortening time, or in  
20 the alternative, a stipulation to continue the motion hearing  
21 date. I was unsuccessful in reaching Ms. Kanter, however I left  
22 a voice mail regarding same.

23 7. Counsel's request for an order shortening time is not  
24 a dilatory tactic. Should counsel for the Government request  
25 additional time to file a response in this matter, counsel  
26 hereby stipulates to have this Court set a new or further  
27 motions hearing date, which is convenient to the Court and all  
28 counsel in this matter.

